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1 SUPERIOR COURT OF THE STATE OF CALIFORNIA
2 COUNTY OF LOS ANGELES, SOUTH DISTRICT
3

4 ANDREW TAYLOR, individually and)
5 as successor-in-interest to Donta)
Taylor; SHERRON OLIVER; CARL)
TODD, JR., a Minor; CARMEN TODD,)
a Minor; and CAMREN TODD, a Minor,)
by and through their Guardian Ad)
Litem SHERRON OLIVER,)
)

8 Plaintiff,)
)

9 vs.) Case No.: TC028803
)

10 COUNTY OF LOS ANGELES; LOS)
ANGELES COUNTY SHERIFF'S)
11 DEPARTMENT; and DOES 1 through)
50, Inclusive,)
)

12 Defendants.)
13 _____)
14

15 VIDEO DEPOSITION OF
16

SAMUEL ALDAMA

17 BEVERLY HILLS, CALIFORNIA
18

MAY 16, 2018

21 ATKINSON-BAKER, INC.
COURT REPORTERS
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24 REPORTED BY: Lois Sarkisian, CSR No. 13707, RPR
25 FILE NO: AC052F6

ORIGINAL

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10 COUNTY OF LOS ANGELES; LOS)
ANGELES COUNTY SHERIFF'S)
11 DEPARTMENT; and DOES 1 through)
50, Inclusive,)
12)
Defendants.)
13 _____)
14
15

16 Video deposition of Samuel Aldama taken on behalf
17 of Plaintiffs, at 315 South Beverly Drive, Suite 305,
18 Beverly Hills, California, commencing at 10:02 AM,
19 Wednesday, May 16, 2018, before Lois Sarkisian,
20 CSR No. 13707, RPR.

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Samuel Aldama
May 16, 2018

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A P P E A R A N C E S

2

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15 FOR DEFENDANTS:

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19

20

21 Also Present:

22

Albert Salaz, Videographer

23

24

25

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1 I N D E X

2

3 WITNESS: Samuel Aldama

4	EXAMINATION:	PAGE
5	By Mr. Sweeney	6,133
6	BY Mr. Day	128

7

8

9

10 E X H I B I T S

11 FOR PLAINTIFFS

12	NUMBER	DESCRIPTION	PAGE
13	1	Copy of Document No. 016-10848-2811-013, Interview of Deputy Samuel Aldama, Dated August 30, 2016, Bates stamped DEF 0052 through DEF 0054, 3 pages	87

14 FOR DEFENDANTS:

15	1	Copy of Bates stamped document DEF 0158 which includes a map, 1 page	128
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Samuel Aldama
May 16, 2018

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1 Beverly Hills, California, Wednesday, May 16, 2018, 10:02 AM
2 --oOo-- 10:02:36
3 THE VIDEOGRAPHER: Good morning. I am Albert Salaz, 10:02:36
4 your videographer. I represent Atkinson Baker in Glendale 10:02:47
5 California. I'm a notary public. I'm not financially 10:02:52
6 interested in this action nor a relative or employee of any 10:02:55
7 attorney or any of the parties. 10:02:58
8 The date is May 16, 2018, and we are on the record 10:03:00
9 at 10:03 AM. This deposition is taking place at 315 South 10:03:04
10 Beverly Drive, Suite 305, Beverly Hills, California, 90212; 10:03:11
11 case number TC 028803, case entitled Andrew Taylor et al., 10:03:16
12 versus County of Los Angeles. The deponent is deputy Samuel 10:03:24
13 Aldama. This deposition is taking place -- or this 10:03:30
14 deposition is taken on behalf of the plaintiff. Your court 10:03:34
15 reporter today is Lois Sarkisian from Atkinson Baker. 10:03:38
16 Will counsel from both parties identify themselves. 10:03:46
17 MR. SWEENEY: John Sweeney for the plaintiffs. 10:03:51
18 MS. HOIKKA: Nicole Hoikka for the plaintiffs. 10:03:54
19 MR. DAY: Douglas Day on behalf of the Defendants. 10:03:56
20 THE VIDEOGRAPHER: Thank you. Will the court reporter 10:03:58
21 please administer the oath. 10:04:00
22 Samuel Aldama, 10:04:00
23 having first been duly sworn, was 10:04:00
24 examined and testified as follows: 10:04:00
25 THE VIDEOGRAPHER: Please begin.

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1	Q Who felt that you earned it?	11:26:23
2	A Our peers at the station.	11:26:27
3	Q What peers? Your peers? You don't know the name,	11:26:35
4	correct?	11:26:41
5	A Well, the deputies who work at the station.	11:26:42
6	Q Okay. So there is some type of voting then,	11:26:45
7	correct?	11:26:49
8	MR. DAY: Objection; no foundation.	11:26:49
9	THE WITNESS: No.	11:26:53
10	BY MR. SWEENEY:	11:26:54
11	Q Well, if your peers recommend it, they have to	11:26:54
12	recommend it to somebody, and somebody makes a decision,	11:26:58
13	correct?	11:27:02
14	A It's not recommended, sir.	11:27:10
15	Q But your peers -- you just testified that your	11:27:13
16	peers recommend you, correct?	11:27:16
17	A Our peers think something of hard work and	11:27:31
18	dedication, sir, to the station.	11:27:39
19	Q And they tell somebody that and that person sends	11:27:43
20	this tattoo artist over to you?	11:27:47
21	A They don't tell nobody. They just recommend me.	11:27:57
22	Q Who do they recommend you to?	11:28:02
23	A Not recommend me. They just give me the -- a	11:28:06
24	contact information of the guy.	11:28:11
25	Q Who gives you the contact information, your peers?	

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1	A	Peers who have gotten tattoos by him.	11:28:20
2	Q	Who have what?	11:28:25
3	A	Peers who have gotten tattoos.	11:28:26
4	Q	Who have those same tattoos from Compton?	11:28:28
5	A	Not the same tattoos; other tattoos.	11:28:32
6	Q	What other tattoos?	11:28:35
7	A	Other random tattoos, sir.	11:28:41
8	Q	How many tattoos have you seen like yours?	11:28:44
9	A	A few.	11:28:53
10	Q	How many is a few? Is it more than 10?	11:28:57
11	A	Yes.	11:29:08
12	Q	More than 20?	11:29:10
13	A	No.	11:29:15
14	Q	Pretty exclusive club then, correct?	11:29:18
15	MR. DAY:	Objection; argumentative.	11:29:20
16	THE WITNESS:	No.	11:29:25
17	BY MR. SWEENEY:		11:29:26
18	Q	What do the flames symbolize on your tattoo?	11:29:27
19	A	It's just a design around the skull.	11:29:35
20	Q	It's what?	11:29:41
21	A	A design.	11:29:41
22	Q	Around the skull?	11:29:42
23	A	Yes, sir.	11:29:43
24	Q	What color are the flames?	11:29:44
25	A	There's no color in the flames.	

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1	that's why you were chasing him?	11:58:02
2	A Possibly, sir.	11:58:04
3	Q Did you see him with a gun that day?	11:58:07
4	A I don't recall, sir.	11:58:19
5	Q So if I have the police report, it's going to say	11:58:26
6	in there -- it's not going to make any mention in there that	11:58:31
7	Sheldon Lockett possessed a gun that day, correct?	11:58:37
8	MR. DAY: Objection; argumentative, no foundation.	11:58:42
9	THE WITNESS: I'm not sure what the report is going to	11:58:46
10	say, sir.	11:58:48
11	BY MR. SWEENEY:	11:58:51
12	Q Let's put this report aside for a second and talk	11:58:52
13	about your recollection of the event today. Did Sheldon	11:58:56
14	Lockett have a gun that day? Did you see him with a gun	11:59:01
15	before the chase?	11:59:08
16	A I don't remember, sir.	11:59:18
17	Q Then why were you chasing him?	11:59:27
18	A I don't recall the incident, sir.	11:59:47
19	Q Okay.	12:00:01
20	Do you harbor any racial animus toward African	12:00:04
21	Americans?	12:00:32
22	A Could you rephrase that question, sir?	12:00:32
23	Q Do you know what animus means? Do you have any ill	12:00:34
24	feelings toward African Americans in general?	12:00:41
25	A Ill feelings? I'm not --	

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1 Q I'm sorry? 12:01:00
2 A Could you repeat that question one more time, sir. 12:01:01
3 Q Do you have any ill feelings in general against 12:01:03
African Americans? 12:01:06
5 A I have feelings for African Americans, sir. 12:01:43
6 Q What are your feelings? 12:01:56
7 A They are just human beings, sir. 12:01:58
8 Q Did you hear my question, sir? Do you have any ill 12:02:01
feelings toward African Americans? 12:02:09
10 A I do, sir. 12:02:24
11 Q Okay. Tell me about your feelings. 12:02:31
12 A I grew up in the city of Compton, sir, mostly 12:02:34
Hispanics, African Americans so I, you know, pretty much 12:02:46
13 grew up with everyone around. I'm not -- 12:02:50
15 Q So what is the source of your ill feelings? 12:02:54
16 MR. DAY: Counsel, I don't think the witness was done 12:02:57
with his answer. 12:02:59
18 MR. SWEENEY: I'm sorry? 12:03:00
19 MR. DAY: I don't think the witness was done with his 12:03:01
answer. 12:03:03
21 BY MR. SWEENEY: 12:03:04
22 Q I'm just trying to -- I'll withdraw the question. 12:03:04
23 What is the source of your ill feelings toward 12:03:07
African Americans? 12:03:09
25 A Like I said, sir, I grew up in the city of Compton,

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1 and I have no problems or anything with -- 12:03:25
2 Q You said you had ill feelings toward African 12:03:28
3 Americans. What is the source? Have they done something to 12:03:31
4 you? 12:03:34
5 A No, I don't have any ill feelings. 12:03:34
6 Q Didn't he just say he had ill feelings? 12:03:37
7 A I misunderstood the question then, sir. 12:03:42
8 Q Okay. Is there some racial animosity between 12:03:45
9 blacks and Hispanics in Compton? 12:03:51
10 A No, sir. 12:03:53
11 Q Let's take a break. 12:03:58
12 THE VIDEOGRAPHER: We are going off the record. The 12:04:00
13 time is 12:04 PM. 12:04:04
14 (A break was taken in the proceedings.) 12:04:09
15 THE VIDEOGRAPHER: We're back on the record. The time 12:21:28
16 is 12:21 PM. 12:21:40
17 MR. DAY: Counsel, before you go back to your 12:21:42
18 questioning, Deputy Aldama wanted to make a comment about 12:21:46
19 your last -- the last couple of questions and his response. 12:21:52
20 MR. SWEENEY: Okay. Let me just put on the record that 12:21:54
21 Deputy Aldama has consulted with counsel, and after about a 12:22:00
22 15-minute break you have something new to say. Say it. 12:22:07
23 MR. DAY: Well, the 15-minute break had nothing to do 12:22:11
24 with conference, the length of conference with counsel, 12:22:14
25 since I was also conferencing with you, Mr. Sweeney, but go

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1 ahead, Deputy. 12:22:21
2 THE WITNESS: I just want to say I misunderstood the 12:22:22
3 question. I'm not -- I don't have any ill feelings. 12:22:24
4 BY MR. SWEENEY: 12:22:29
5 Q Okay. 12:22:30
6 Growing up, did you have any physical altercations 12:22:35
7 with African Americans in Compton? 12:22:39
8 A No, sir. 12:22:41
9 Q Do you know the name of an arrestee by the name of 12:22:43
10 Jeremiah Wilkerson? Does that ring a bell? 12:23:07
11 A No, sir. Jeremiah Wilkerson, no. 12:23:17
12 Q Do you know about an incident between Orrego and 12:23:22
13 Jeremiah Wilkerson where Mr. Wilkerson alleged that Deputy 12:23:25
14 Orrego used excessive force? 12:23:30
15 MR. DAY: Objection; calls for speculation. 12:23:37
16 THE WITNESS: No, sir. 12:23:39
17 MR. SWEENEY: This is a good place to take a break. I'm 12:23:39
18 ready to go into the Donta Taylor incident. 12:23:42
19 MR. DAY: Okay. 12:23:46
20 MR. SWEENEY: Off the record. 12:23:47
21 THE VIDEOGRAPHER: We're going off the record. The time 12:23:48
22 is 12:23 PM. 12:23:50
23 (A lunch break was taken at 12:23 PM 12:23:50
24 until 1:35 PM.) 13:31:46
25 THE VIDEOGRAPHER: We are back on the record. The time

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1	two weeks of --	15:14:17
2	MR. DAY: Our receipt?	15:14:21
3	MR. SWEENEY: Of your receipt. And then what did I say?	15:14:22
4	MR. DAY: You said 14 days after.	15:14:28
5	MR. SWEENEY: Fourteen more days to notify us of any	15:14:30
6	changes.	15:14:33
7	MR. DAY: So stipulated.	15:14:33
8	MR. SWEENEY: Thank you, Deputy, for coming.	15:14:35
9	THE VIDEOGRAPHER: This is the end of the video	15:14:39
10	deposition of Deputy Samuel Aldama. We are going off the	15:14:41
11	record. The time is 3:14 PM.	15:14:46
12	(The deposition was concluded at 3:14 PM.)	15:14:46
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1 STATE OF _____)

2 COUNTY OF _____)

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7 I, the undersigned, declare under penalty
8 of perjury that I have read the foregoing transcript,
9 and I have made any corrections, additions or
10 deletions that I was desirous of making; that the
11 foregoing is a true and correct transcript of
12 my testimony contained therein.

13 EXECUTED this _____ day of _____,
14 _____, at _____, _____.
(City) (State)

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SAMUEL ALDAMA

1 REPORTERS CERTIFICATE
2
3

4 I, LOIS SARKISIAN, CSR No. 13707, RPR, Certified
5 Shorthand Reporter, certify:

6 That the foregoing proceedings were taken before
7 me at the time and place therein set forth, at which time
8 the witness was put under oath by me;

9 That the testimony of the witness, the questions
10 propounded, and all objections and statements made at the
11 time of the examination were recorded stenographically by me
12 and were thereafter transcribed;

13 That the foregoing is a true and correct transcript
14 of my shorthand notes so taken.

15 I further certify that I am not a relative or
16 employee of any attorney of the parties, nor financially
17 interested in the action.

18 I declare under penalty of perjury under the laws
19 of California that the foregoing is true and correct.

20 Dated this 20th day of May , 2018.

21
22
23 Lois Sarkisian

24 Lois Sarkisian, CSR No. 13707, RPR
25